

COOLEY LLP
WHITTY SOMVICHIAN (194463)
wsomvichian@cooley.com
REECE TREVOR (316685)
rtrevor@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

REBECCA GIVNER-FORBES (*Appearing pro hac vice*)
rgf@cooley.com
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800
Facsimile: (202) 842 7899

Attorneys for Plaintiff
GOOGLE LLC

THE MORALES LAW FIRM
DAVID MORALES (191229)
morales@alum.mit.edu
99 S. Almaden Blvd., Suite 600
San Jose, CA 95113
Telephone: (888) 836-0880

Attorneys for Defendants
ETHAN QIQI HU, GMBEYE,
and RAFADIGITAL LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOOGLE LLC, a Delaware limited liability
company,

Plaintiff,

v.

ETHAN QIQI HU, an individual; GMBEYE;
RAFADIGITAL LLC, a Mississippi limited
liability company; and DOES 1–20,

Defendants.

Case No. 3:23-cv-02964-JD

**JOINT STATEMENT ON THE STATUS OF
SETTLEMENT**

1 Plaintiff Google LLC (“Google”) and Defendants Ethan Qiqi Hu, GMBEye, and Rafadigital
2 LLC (with Google, the “Parties”) submit this Joint Statement on the Status of Settlement (“Joint
3 Statement”) pursuant to the Court’s December 21, 2023 Minute Order. (ECF No. 29.) The Parties
4 continue to be engaged in diligent and productive settlement discussions, and they have exchanged
5 drafts of a comprehensive settlement agreement. The Parties anticipate finalizing that written
6 agreement as expeditiously as possible.

1 Dated: January 16, 2024

2 Respectfully submitted,

3
4 By: /s/ Whitty Somvichian

Whitty Somvichian

5
6 COOLEY LLP
7 WHITTY SOMVICHIAN (194463)
wsomvichian@cooley.com
8 REECE TREVOR (316685)
rtrevor@cooley.com
9 3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
10 Telephone: (415) 693-2000
Facsimile: (415) 693-2222

11 REBECCA GIVNER-FORBES (*Appearing pro hac vice*)
rgf@cooley.com
12 1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
13 Telephone: (202) 842-7800
14 Facsimile: (202) 842 7899

15 Attorneys for Plaintiff
GOOGLE LLC

16
17 Dated: January 16, 2024

18 Respectfully submitted,

19
20 By: /s/ David Morales

David Morales

21 THE MORALES LAW FIRM
22 DAVID MORALES (191229)
morales@alum.mit.edu
23 99 S. Almaden Blvd., Suite 600
San Jose, CA 95113
24 Telephone: (888) 836-0880

25 Attorneys for Defendants
26 ETHAN QIQI HU, GMBEYE, and RAFADIGITAL LLC
27
28

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civ. L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from counsel for Defendants.

Dated: January 16, 2024

By: /s/ Whitty Somvichian
Whitty Somvichian

296738259